

Comments on Draft Report for Hugo

EPA: None

State: None

Company: See attached letter dated April 21, 2011

April 21, 2011

Mr. Stephen Hoffman  
US Environmental Protection Agency (5304P)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Re: Western Farmers Electrical Cooperative  
Hugo Power Plant  
Comments on Assessment of Dam Safety of  
Coal Combustion Surface Impoundments

Dear Mr. Hoffman,

WFEC appreciates the opportunity to comment on the draft assessment of our Hugo Plant. WFEC has reviewed the draft assessment and has identified some areas that warrant the following comments.

**Section 2.6 Monitoring Instrumentation, Page 2-6**

The section states there are two monitoring wells at the site. Actually there are 11 monitoring wells at the site. There are two (2) up-gradient wells and nine (9) down-gradient wells. Of the nine (9) down-gradient wells, five (5) are down-gradient of the fly ash impoundment and four (4) are down-gradient of the bottom ash impoundment. A drawing is attached showing the approximate location of the monitoring wells.

**Section 4.2 Acknowledgement of CCW Impoundment Condition, Page 4-1 and 4-2**

The draft report says that since no documentation can be furnished concerning original stability, hydrology or hydraulic studies for the facility it warrants a rating of a **POOR** condition. WFEC could not disagree more. First by CDM's own report (see table 3) all the impoundments are rated low hazard. Second, there are low potential impacts from the impoundments if they fail. Third, if you look at the age of the impoundments (30 years old) by CDM's own inspection results they are in good shape. Finally, in section 3.2 page 3-1 the report states "it is anticipated the OWSB (we think this should be OWRB) would characterize them (the impoundments) as low hazard potential". Based on these reasons the impoundments should be upgraded from a poor rating. In addition, WFEC has requested Burns and McDonnell (original design engineering company) look through their archives for additional documentation on the design of the impoundments. If found this documentation will be forwarded.

A Powerful Friend to:

Alfalfa Electric Cooperative • Alfus Air Force Base • Caddo Electric Cooperative • Canadian Valley Electric Cooperative • Choctaw Electric Cooperative • Cimarron Electric Cooperative  
Cotton Electric Cooperative • East Central Oklahoma Electric Cooperative • Harmon Electric Association • Kay Electric Cooperative • Kiamichi Electric Cooperative  
Kiwash Electric Cooperative • Northfork Electric Cooperative • Northwestern Electric Cooperative • Oklahoma Electric Cooperative • People's Electric Cooperative  
Red River Valley Rural Electric Association • Rural Electric Cooperative • Southeastern Electric Cooperative • Southwest Rural Electric Association

**Section 4.4 Erosion Protection and Repair, Page 4-2**

WFEC agrees that eroded areas need to be addressed. Maintenance request have been entered to complete the repair to the eroded areas. Depending on weather, the areas identified will be repaired within three months.

**Section 4.5 Seepage, Page 4-2**

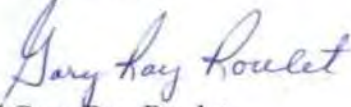
The seepage area will be marked and monitored. Maintenance will be performed as necessary.

**Section 4.7 Inspection Recommendations, Page 4-3**

Procedures will be updated to ensure better documentation of inspections performed on the impoundments. Please note that inspections have been performed regularly, however, they were not documented sufficiently in the opinion of CDM.

Again, WFEC would like to thank EPA for the opportunity to comment on the draft report. WFEC looks forward to completing the report on our facility in a timely manner.

Respectfully,



Gary Ray Roulet  
Chief Executive Officer  
Western Farmers Electric Cooperative



**Figure Title**  
**Site Layout and Well Locations**

Document Title  
Sampling and Analysis Plan

Client  
Western Farmers Electric Cooperative

Location  
Hugo, Oklahoma

Date	9/30/2005
Scale	As Shown
Drawn By	DM
Checked By	DM
Approved By	TS

Project Number	4100504701
Figure Number	